

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Campbell</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

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**MOTION TO COMPEL**

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Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully moves this Court to compel Defendant Guidepost Solutions LLC (“Guidepost”) to (1) redesignate documents marked “Attorneys’ Eyes Only” to “Confidential” under the Amended Agreed Protective Order; (2) state whether specifically-identified missing documents were destroyed and provide a complete document production; and (3) supplement its responses to Plaintiff’s Third Set of Interrogatories.

As explained in the accompanying Memorandum, there is no justification for an “Attorneys’ Eyes Only” designation for any of the documents produced by Guidepost; Guidepost has failed to provide a complete document production and refused to answer Plaintiff’s questions regarding specific missing documents; and Guidepost’s answers to Plaintiff’s Third Set of Interrogatories are deficient. Guidepost’s refusal to comply with its obligations under the Federal Rules of Civil Procedure is stalling the progression of this litigation.

As required by Local Rule 7.01, counsel for Plaintiff hereby certifies that they have conferred in good faith with counsel for Guidepost regarding the nature of this Motion, the issues raised in this Motion, and the relief requested in this Motion. Plaintiff and Guidepost filed a Joint Discovery Dispute Statement regarding the issues raised in this Motion on January 9, 2024. (Doc. No. 100). At the January 10, 2024 status conference, the Court authorized a motion to compel with respect to all issues raised in the Joint Discovery Dispute Statement. After the January 10 conference, Plaintiff's counsel met with Guidepost's counsel but was unable to reach a resolution, as Guidepost's counsel abruptly ended the meet and confer and refused to discuss other topics.

Plaintiff respectfully submits this Motion in the interests of seeking the Court's assistance in resolving this discovery dispute and expediting this litigation.

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum and the Joint Discovery Dispute Statement filed on January 9, 2024, (Doc. No. 100), this Court should grant this Motion.

Dated: January 19, 2024

Respectfully submitted,

s/ Andrew Goldstein

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## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing Motion to Compel to be electronically filed with the Clerk of the Court on January 19, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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